REMARKS

Drawing. The Examiner objected to Figs. 4(a) and Figs. 9 and 10(a), as stated on page 2 of the Action. A replacement sheet for Fig. 4(a) is attached. No new matter is entered. Approval is requested. As to adding "prior art" to Fig. 9, this is respectfully traversed because Fig. 9 does not show "only that which is old," as the Examiner asserts. Many elements shown in Fig. 9 are part of the Applicants' claimed combination. As to Fig. 10, this shows a result of the prior art, not the prior art itself. The Applicants do not admit that Fig. 10 is outside the scope of the claims, because if the power supply 5 were un-powered, then Fig. 10 might result. It is noted that the description of Fig. 9 was labeled "BACKGROUND" and not "PRIOR ART" (and is not NOW re-labeled as "CONVENTIONAL PARTS OF THE INVENTION").

Specification. A substitute specification is attached, with a marked-up version showing changes. No new matter is entered.

The Examiner's requirements are respectfully traversed as the Office Action at page 5, fourth line from the bottom; page 4, line 4 (on page 8, line 19); page 5, lines 3-6, 12, 14-17; and page 6, lines 1, 3-9, 11-14, 18 (traversed in part) and 20-22. As was mentioned above, the conventional parts shown in Fig. 9 are parts of the invention also. The Applicants use reference numerals of features already described (in regard to other embodiments) and refer to them as "the" feature and not "a" feature. This is believed to be proper if the feature was already mentioned earlier in the specification. This is the basis of the traversals.

Claim Objection. The claims are amended.

§ 102, Doutney. Claims 1, 5, 9, 11, and 12 were rejected under 35 USC §102(b) as being anticipated by Doutney. This rejection is respectfully traversed.

Doutney discloses a cleaning brush 26 in contact with the surface of the drum 11, as the Examiner points out. An AC voltage is applied to the brush 26 for neutralizing the residual charge on the drum 11 and teaches that there should be no charge left on the drum (column 2, line 63 and column 3, lines 48-65). This reference discloses no bias voltage on the AC and teaches against any bias voltage. Thus, Doutney teaches an average potential of zero, and does

not disclose features (b) and (c) of amended claim 1. As to new claim 20, Doutney is contrary to feature (d).

§ 102, Hashimoto. Claims 1, 9, and 13 under 35 USC §102(b) as being anticipated by Hashimoto. This rejection is respectfully traversed.

Hashimoto discloses a brush 12 as a precharging device in contact with the surface of the drum 1, as noted in the rejection. However, the polarity of the polarity applied by the brush 12 to the drum 1 is opposite to the polarity applied by the charging device 2 to the drum 1 (column 5, line 67 and column 7, lines 15-28, especially line 19). Thus, Hashimoto is contrary to claim feature (c) in claim 1. Furthermore, Hashimoto teaches AC (column 7, lines 23-25) and therefore teaches against feature (d) of new claim 20.

§ 102, Koiso. Claims 1, 4, and 9 - 11 under 35 USC §102(e) as being anticipated by Koiso. This rejection is respectfully traversed.

Koiso discloses a discharging member 156 in contact with the surface of the photoreceptor (drum) 1A, which the Examiner equates to the claimed precharging device. However, member 156 is electrically grounded so that its potential is zero (column 5, line 26), or, the polarity of the discharging voltage is opposite to the polarity of the toner on the photoreceptor 1A (column 5, lines 26-32). Since the imaging light conventionally discharges the surface to make toner stick, the potential of the toner should be the same as the potential of the drum, which comes from the charger 11 (besides the member 156, the only charging device disclosed is the charger 11). Thus, Koiso does not disclose claim feature (c), same polarity. Neither is feature (d) of new claim 20 disclosed.

§ 102, Hirabayashi. Claims 1, 15, 16, and 18 under 35 USC §102(e) as being anticipated by Hirabayashi. This rejection is respectfully traversed.

Hirabayashi discloses a "non-contact" conductive member 6 (column 6, line 26) placed near a photosensitive member (drum) 1. Because it does not touch the drum it is contrary to feature (a) of amended claim 1.

AC voltage and DC voltage are applied to the member 6 (col. 6, lines 44-45), alternating at 500 Hz between 100 and -1700 volts, with a bias of -900 volts. However, as seen from

column 8, lines 20-30 of Hirabayashi, the absolute value of the peak voltage (i.e., -1700V) of the conductive member 6 is greater than the absolute value of the voltage (-680V) applied by the charging roller 2 to the photosensitive member 1. Thus, Hirabayashi does not disclose feature (b) and does not anticipate new claim 20.

Accordingly, none of the references teaches the combination of the above described features (a) through (c) of claim 1. Also as pointed out above, new claim 20 recites features (b) and (c) as does claim 1, argued for above, and also recites feature (d) which also is not disclosed by the applied art. Hashimoto and Koiso do not teach features (b) and (c), while Hirabayashi does not teach features (b) and (d). Accordingly, none of the references teaches the combination of the above described features (b) through (d) of Claim 20.

Allowable Claims. The objected-to claims 2, 6- 8, 14, 17 and 19 are all amended to be in independent form, and should now be allowable. Allowable claim 3 is made to depend from claim 2 and should be allowable.

Respectfully submitted,

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I certify that this correspondence is being facsimile transmitted to the United States Patent and Trademark Office (fax no. 703-872-9306) on April 11, 2005 (total 29 pages).

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